

**AMTA**  
American Mobile Telecommunications Association  
The Business Communications Industry Association

EX PARTE OR LATE FILED

**PRESIDENT & CEO**

Alan R. Shark, CAE

**GENERAL COUNSEL**

Elizabeth R. Sachs, Esq.  
Lukas, McGowan, Nace & Gutierrez

March 21, 1997

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Federal Communications Commission

**via Hand Delivery**

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

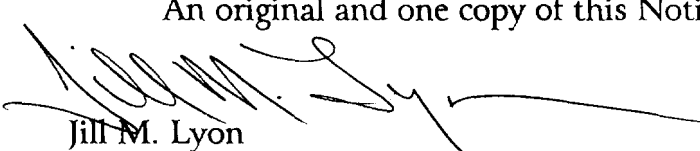
Re: Notice of oral ex parte presentation  
CC Docket No. 95-54, CC Docket No. 94-102 /  
CC Docket No. 95-116, ET Docket No. 93-62

Dear Mr. Caton:

On March 20, 1997, the American Mobile Telecommunications Association, Inc. (AMTA) made an oral ex parte presentation concerning the above-captioned dockets to Suzanne Toller, Legal Advisor to Commissioner Rachelle Chong. The meeting focused on FCC progress in working on AMTA's Petition for Declaratory Ruling, filed December 16, 1996, seeking clarification concerning the FCC's definition of "covered SMR" systems in the above-referenced proceedings. AMTA's position on the covered SMR definition is fully detailed in its Petition.

During the meeting, AMTA provided Ms. Toller with a written timeline for implementation of new regulations in the above-referenced proceedings, along with a letter, dated February 27, 1997, from Theodore I. Weintraub, chairman of the Emergency Number Systems Board of the State of Maryland's Department of Public Safety and Correctional Services, to Michael Hirsch, vice president of Geotek Communications. The letter requested information on Geotek's plans for implementing new FCC regulations concerning wireless 911 service. A copy of the timeline and letter are attached to this Notice.

An original and one copy of this Notice have been submitted.

  
Jill M. Lyon  
Dir of Regulatory Relations

cc: Suzanne Toller, Legal Adviser



## **“Covered SMR” Proceedings -- Regulatory Timetable**

### **I. Resale** (CC Docket No. 94-54) -- *First Report and Order* adopted June 12, 1996; **rules became effective September 22, 1996:**

- no broadband PCS, cellular or covered SMR provider may offer like services to resellers at less favorable prices, terms or conditions than are available to other similarly situated customers, absent reasonable justification;
- no above provider may directly/indirectly restrict resale in an unreasonable manner;
- providers need not structure their operations or offerings or adopt business structures to promote resale, establish a resale margin or guarantee a profit to resellers.
- requirements expire five years after award of D, E, and F block PCS licenses.

### **II. Roaming** (CC Docket No. 94-54) -- *Second Report and Order* adopted June 27, 1996; **rules became effective October 26, 1996:**

- cellular, broadband PCS and covered SMR providers must provide service to any individual roamer whose handset is technically capable of accessing their network (“manual” roaming);
- in *Third Notice of Proposed Rulemaking*, FCC considering whether to require “automatic” roaming, requiring roaming agreements among carriers and no action by subscriber other than activating handset while roaming.

### **III. RF Radiation Standards** (ET Docket No. 93-62) -- **implementation of *Report and Order* requirements extended until September 1, 1997.**

- cellular, broadband PCS and covered SMR transmitters considered to be operating in “general population/uncontrolled” environment, generally requiring lower exposure to RF emissions;

- covered SMR portable devices among those requiring routine SAR (specific absorption rate) evaluation prior to equipment authorization or use;
- covered SMR transmitters subject to routine environmental evaluation if less than 10 meters above ground with power of all channels greater than 1000 watts ERP (if non-rooftop), or if the total power of all channels is greater than 1000 watts ERP if a rooftop installation.

**IV. Enhanced 911** (CC Docket No. 94-102) – *Report and Order* adopted June 12, 1996

- Phase One: **by October 1, 1997**, broadband PCS, cellular and covered SMR providers must process all 911 calls to PSAPs without user validation from handsets with MIN or equivalent, and transmit calls by the speech/hearing disabled through use of TTY devices. Calls from handsets without MIN or equivalent must be so transmitted if requested by PSAP;
- Phase Two: **by October 1, 1997**, providers must have initiated actions to relay Automatic Number Identification and base station location to PSAPs;
- **by April 1, 1998**, actions allowing relay of ANI and base station location must be completed;
- **by October 1, 2001**, providers must identify and transmit the latitude/longitude of mobile unit within a radius of 125 meters, with 67% reliability.

**V. Number Portability** (CC Docket No. 95-116) – *Report and Order* adopted June 27, 1996

- **by December 31, 1998**, cellular, broadband PCS and covered SMR providers must have capability of delivering calls to ported numbers anywhere in the country;
- **by June 30, 1999**, providers must offer service provider portability (including support of roaming) throughout their networks.



PARRIS N. GLENDENING  
GOVERNOR

KATHLEEN KENNEDY TOWNSEND  
GOVERNOR

STATE OF MARYLAND  
DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONAL SERVICES  
EMERGENCY NUMBER SYSTEMS BOARD

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VICE CHAIRMAN

JAMES A. NIXON  
COORDINATOR

February 27, 1997

Mr. Michael Hirsch  
Vice President External Affairs  
Goetek Communications Inc.  
1200 19th Street NW Suite 560  
Washington, DC 20036

Dear Mr. Hirsch:

The Emergency Number Systems Board (ENSB) of Maryland would like to formally notify you of Phase I of the FCC's recent E9-1-1 ruling.

Under Phase I of the mandate, not later than 12 months after the effective date of the rules, wireless carriers must have initiated the actions necessary to enable them to relay a caller's Automatic Number Identification (ANI) and the location of the base station or cell site receiving a 9-1-1 call to the designated PSAP. Not later than 18 months after the effective date of the rules adopted in the FCC Order, such carriers must have completed these actions. These capabilities will allow the PSAP attendant to call back if the 9-1-1 call is disconnected.

The ENSB of Maryland will be coordinating this effort on behalf of Maryland's 24 PSAPs and would like to be made aware of your company's deployment plans/schedule for implementing Phase I of this mandate. We would also like to have your thoughts on an appropriate cost recovery mechanism.

Please respond to this request by March 21, 1997 so that the Board may discuss the status at the next scheduled meeting on March 25, 1997.

Sincerely,

*Theodore I. Weintraub*  
Theodore I. Weintraub  
Chairman